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12 WREN TURKAL, on behalf of
13 themselves and all others similarly situated

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Attorneys for Defendant
X CORP. f/k/a TWITTER, INC.

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA

19
20 CAROLINA BERNAL STRIFLING and
21 WILLOW WREN TURKAL, on behalf of
22 themselves and all others similarly situated,

23 Plaintiffs,

24 v.

25 TWITTER, INC.,

26 Defendant.

Case No. 4:22-cv-07739-JST

Related to Case No. 3:24-cv-04054-JST

**JOINT STIPULATION AND
[PROPOSED] ORDER TO REVISE
BRIEFING AND HEARING
SCHEDULE**

1 Plaintiffs Carolina Bernal Strifling and Willow Wren Turkal (“Plaintiffs”) and Defendant
2 X Corp. on its own behalf and as successor in interest to Twitter (“Defendant” or “Twitter”)
3 (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate as
4 follows:

5 WHEREAS, on April 25, 2025, Plaintiffs filed their Motion for Class Certification (ECF
6 No. 106), which included as attachments various arbitration awards involving Defendant and
7 other clients of Plaintiffs’ counsel, which Defendant contends are confidential;

8 WHEREAS, on April 28, 2025, the court vacated the June 19, 2025 hearing date on
9 Plaintiffs’ Motion for Class Certification because it is a holiday and instructed Plaintiffs to re-
10 notice the motion for another date (ECF No. 112);

11 WHEREAS, on May 5, 2025, Defendant filed papers in support of sealing certain
12 materials, including the arbitration awards, that Plaintiffs attached to their class certification
13 motion (ECF No. 114), and on May 7, 2025, the Court granted the motion to seal (ECF No. 116);

14 WHEREAS, on May 5, 2025, Defendant filed its motion to strike the arbitration awards
15 that Plaintiffs filed in support of their Motion for Class Certification (“Motion to Strike”), with a
16 hearing date of July 3, 2025 (ECF No. 115);

17 WHEREAS, the parties respectfully request that the Court advance the hearing on the
18 Motion to Strike from July 3, 2025 to June 12, 2025 or June 26, 2025;

19 WHEREAS, Defendant believes that fairness and efficiency support continuing the
20 briefing schedule on the Motion for Class Certification until after the Court rules on the Motion to
21 Strike, when the record on Plaintiffs’ Motion for Class Certification will be settled, so that
22 Defendant knows what materials and arguments it must address in its Opposition to Class
23 Certification. Defendant requested that Plaintiffs agree to modify the schedule accordingly;

24 WHEREAS, to promote the orderly administration of justice and to conserve the Parties’
25 resources by ensuring that the Parties are addressing only materials before the Court on Plaintiffs’
26 Motion for Class Certification, Plaintiffs agreed to Defendant’s request that its response deadline
27 to Plaintiffs’ Motion for Class Certification be deferred until after the Court rules on Defendant’s
28 Motion to Strike; and

WHEREAS, the Parties agree the Court should continue the hearing and briefing schedule on Plaintiffs' Motion for Class Certification and adopt the following schedule:

<u>Event</u>	<u>Current Date</u>	<u>Proposed Change</u>
Opp. re Motion to Strike	May 19, 2025 (ECF No. 114)	No change
Reply re Motion to Strike	May 27, 2025 (<i>Id.</i>)	No change
Hearing re Motion to Strike	July 3, 2025 (<i>Id.</i>)	June 12, 2025 or June 26, 2025
Opp./Experts re Motion for Class Cert.	May 27, 2025 (ECF No. 105)	+ 21 days from order on Motion to Strike.
Expert deadline re Class Cert.	June 10, 2025 (<i>Id.</i>)	+ 35 days from order on Motion to Strike.
Reply re Motion for Class Cert.	June 17, 2025 (<i>Id.</i>)	+ 42 days from order on Motion to Strike.
Hearing re Motion for Class Cert.	None (ECF No. 112)	First Thursday that is at least +63 days from order on Motion to Strike, or other date that is convenient for the Court.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties, by and through their counsel of record, that the briefing and hearing schedule be revised accordingly.

IT IS SO STIPULATED.

Dated: May 13, 2025

MORGAN, LEWIS & BOCKIUS LLP

By /s/ Brian D. Berry

Eric Meckley
 Brian D. Berry
 Roshni C. Kapoor
 Ashlee N. Cherry
 Carolyn M. Corcoran
 Attorneys for Defendant
 X CORP. f/k/a TWITTER, INC.

1 Dated: May 13, 2025

LICHTEN & LISS-RIORDAN, P.C.

2
3 By /s/ Shannon Liss-Riordan
Shannon Liss-Riordan
4 Thomas Fowler
Attorneys for Plaintiffs
5 CAROLINA BERNAL STRIFLING and
WILLOW WREN TURKAL, on behalf of
6 themselves and all others similarly situated

7 **Signature Attestation**

8 Pursuant to Local Rule 5-1(i)(1), I certify that each of the other signatories to this
9 document have concurred in its filing.

10 /s/ Brian D. Berry
11 Brian D. Berry

12 **[PROPOSED] ORDER**

13 PURSUANT TO STIPULATION, IT IS SO ORDERED.

14 DATED:

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16 HON. JON S. TIGAR
17 UNITED STATES DISTRICT JUDGE
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